



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

MB/AS
F. #2019R01465

*271 Cadman Plaza East
Brooklyn, New York 11201*

October 7, 2020

By ECF and Overnight Mail

Alex Spiro, Esq.
Quinn Emanuel Urquhart & Sullivan, LLP
51 Madison Ave., 22nd Floor
New York, NY 10010

Re: United States v. Javier Aguilar
Criminal Docket No. 1:20-CR-00390 (ENV)

Dear Mr. Spiro:

Enclosed please find the government's second production of discovery in accordance with Rule 16 of the Federal Rules of Criminal Procedure. This production supplements the government's earlier production. The government also requests reciprocal discovery from the defendant.

Specifically, enclosed please find: (1) subpoena returns containing financial records and other materials, BATES numbered DOJ-JVA-0000000001 - DOJ-JVA-0000036773; (2) business records certifications and FBI interview documents, BATES numbered DOJ-ADD-0000000007 - DOJ-ADD-0000000045; and (3) the contents, other than potentially privileged material to which the case team does not have access,¹ of two email accounts used by the defendant, BATES numbered JVA-EMAIL-0000000001 - JVA-EMAIL-0000514739. Because these email accounts belong to the defendant, in an abundance of caution, the government is producing a copy of the entire collection of data it received from Google, regardless of whether the information has been seized pursuant to the relevant search warrant.

¹ The government understands that filter attorney Nicola Mrazek is separately reaching out to you to arrange production of potentially privileged material involving the defendant.

Very truly yours,

SETH D. DUCHARME
Acting United States Attorney

By: /s/ Mark E. Bini
Mark E. Bini
Andrey Spektor
Assistant U.S. Attorneys
(718) 254-7000

Enclosures

cc: Clerk of the Court (ENV) (by ECF) (without enclosures)
Ann Brickley & Adam Schwartz, U.S. Department of Justice (without enclosures)
Derek Ettinger, Jonathan Robell & Clayton Solomon, U.S. Department of Justice
(without enclosures)